

**7IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	In Proceedings
	)	Under Chapter 13
Milton C. Bell, Jr.,	)	
<i>aka</i> Milton C. Bell	)	
Cynthia Y. Bell,	)	Case No. 18-17111
<i>aka</i> Cynthia Yarrington-Bell	)	
<i>aka</i> Cynthia F. Yarrington-Bell	)	
Debtors.	)	Honorable Judge Goldgar

**OBJECTION TO CONFIRMATION OF PLAN**

NOW COMES Exeter Finance, LLC, by and through its undersigned attorney, on its Objection to Confirmation of Plan, and in support thereof states as follows:

1. Exeter Finance, LLC has a security interest in one 2014 Jeep Patriot-4 Cyl. Utility 4D Latitude 2WD, VIN 1C4NJPFB1ED916433, which was perfected by recording its lien on title.
2. Exeter Finance, LLC alleges the value set forth in Debtors' Chapter 13 Plan is unacceptable. Debtors propose a "cramdown" pursuant to 11 U.S.C. §506 and allege the value of the collateral is \$10,350.00.
3. Exeter Finance, LLC alleges the value of said vehicle is \$12,925.00 pursuant to a N.A.D.A. valuation.

WHEREFORE, Exeter Finance, LLC respectfully requests this Court for entry of an Order denying confirmation and for such other and further relief as the Court deems just.

Respectfully submitted,

*/s/ Jennifer M. Rinn*

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PO Box 465  
Chicago, IL 60690  
Ph: 586-899-5086

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Debtors.	)	Honorable Judge Goldgar

**NOTICE OF OBJECTION TO CONFIRMATION OF PLAN  
AND CERTIFICATE OF SERVICE**

\*AN OBJECTION TO CONFIRMATION OF PLAN HAS BEEN FILED.

Please be advised that the attached objection to confirmation of plan shall be presented on July 31, 2018 at 11:00 am before the Honorable Judge Goldgar at 219 South Dearborn, Courtroom 642, Chicago, IL 60604, pursuant to the notice generated by the court on July 2, 2018, to the following parties:

Marilyn O Marshall  
224 South Michigan Ste 800  
Chicago, IL 60604

David M Siegel  
David M. Siegel & Associates  
790 Chaddick Drive  
Wheeling, IL 60090

The objection was further served by depositing a printed copy into the US Mail on July 2, 2018, with postage prepaid at the address listed on the creditor matrix, upon the following parties, others not served:

Milton C. Bell, Jr., Cynthia Y. Bell  
1625 N. Naychez Ave.  
Chicago, IL 60707

/s/ Jennifer M. Rinn  
Rinn Richman Law LLC  
PO Box 465  
Chicago, IL 60690  
Ph: 586-899-5086